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June 16, 1999

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Via Hand Delivery

Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RECEIVED
JUN 16 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: The Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Agency Communications Requirements Through the Year 2010, WT Docket No. 96-86

Dear Secretary Salas :

In comments filed in the above captioned proceeding, the Forestry Conservation Communications Association (FCCA), the International Association of Fire Chiefs, Inc. (IAFC), and the International Municipal Signal Association (IMSA) have advised the Commission that "open architecture" is a critical component of standards development for interoperability purposes for the new 700 MHz band public safety frequency allocation. Some parties to this proceeding have recommended a specific technology known as "Project 25" as the appropriate equipment standard. FCCA, IAFC and IMSA have not supported Project 25, *inter alia*, due to concerns about whether Project 25 satisfies the open architecture requirement.

Enclosed is a communication from a Project 25 equipment manufacturer which expresses some of the concerns which have been raised as to whether Project 25 is an open architecture system. The undersigned parties do not vouch for the accuracy of the representations in the

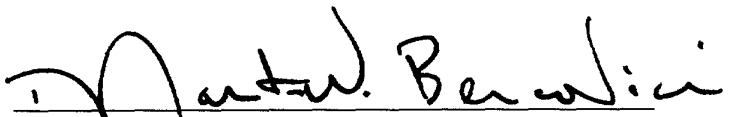
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Magalie R. Salas
June 16, 1999
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attached communication, but rather bring this communication to the Commission's attention so that these issues may be fully considered and an informed judgment made with regard to any decision concerning equipment standards.

Respectfully submitted,

**Forestry Conservation Communications Assoc.
International Association of Fire Chiefs, Inc.
International Municipal Signal Association**


Martin W. Bercovici

cc: Thomas Sugrue
D'wana Terry
Kathleen Wallman

Enclosure

-----Original Message-----

From: Dan Howard [SMTP:dhoward@orbacom.com]
mailto:[SMTP:dhoward@orbacom.com]>
Sent: Thursday, April 15, 1999 1:55 PM
To: jack.keating@westcov.org
Cc: joe_hanna@cor.gov; lgallagh@pioneer.state.nd.us;
gnash@telecom.dgs.ca.govmark.stillings@attws.com; bulletin@apcointl.org;
diehlt@apcointl.org; apco@apcointl.org; apcocac@egroups.com Subject:
[apcocac] APCO "Public Safety Communications", April 1999 TO: Jack Keating,
President, APCO International

Dear Jack:

I read my copy of the April, 1999 issue of APCO's "Public Safety Communications" today... and it made me so angry I could just spit. Not only is the entire issue a virtual commercial for Motorola, but it could certainly be interpreted from this month's lead article that APCO itself is now endorsing Motorola products to the exclusion of all others (with the possible exception of Ericsson, who gets a sort of weak honorable mention). I would certainly expect this to anger other commercial APCO members, when after we support APCO and Project 25 from pockets much less deep than Motorola's find ourselves on the outside looking in while APCO pitches Motorola's products for them, and fills the balance of their official magazine with articles supposedly written by owners of Motorola ASTRO systems (who I suppose are trying to publicly rationalize their decision to buy proprietary pseudo-Project 25 systems from Motorola). Although I expect that Motorola makes a steady stream of articles available for publication (and "ghost writes" many more submitted by Motorola system owners), the editors of this magazine need to either find some journalistic integrity and balance, or just change the name to something like "Motorola Today".

My original intent here was not to go off on a Motorola rant (although I seem to have done that anyway), but to point out how this month's issue of "Public Safety Communications" also validates the points I have made recently to the APCO Project 25 Committee relative to the duality between Motorola's supposed commitment to "open standards" and Project 25, and the reality of what they are selling to the public safety community. At every turn in the articles, and in Motorola's own advertising in the magazine, it is clearly implied (and even stated) that Motorola's ASTRO is a Project 25 system... and it's accepted as gospel. It just ain't so!

ASTRO is a proprietary Motorola system (which may or may not use some elements of the Project 25 CAI) that is designed and being marketed to exclude products from any other vendor... period. It is often combined with other Motorola proprietary systems such as SMARTNET trunking (then sold as "Project 25 trunking", which is even more blatantly deceptive!). The design of Motorola's ASTRO hardware, notably the ASTRO Digital Interface Unit (DIU), is very

revealing of the manner in which Motorola systematically creates proprietary interfaces to Project 25 features (such as the "ACIM" port in the DIU) in these supposed "Project 25" systems, but then refuses to even discuss documenting or licensing these interfaces to other vendors, or even the system owners. I think when all is said and done, many owners of Motorola ASTRO systems who are under the impression that they have purchased APCO Project 25 systems will find that they in fact own something very different than the "open standards" systems that they were led to believe they were buying.

Jack, I hope you can see how things like the April issue of "Public Safety Communications" and the subversion of the Project 25 standards process by Motorola would cause commercial APCO members like myself and the companies which we represent to carefully evaluate our continued support of APCO, Project 25, "Public Safety Communications", and other APCO initiatives.

There is always a concern that there is the hidden agenda, that we are really unwitting pawns serving only to provide financial support to an organization who may no longer represent our interests (but might in fact be a partisan for one of our competitors). I trust the you and therest of the APCO leadership do not share the viewpoint expressed this month in "Public Safety Communications" that there are only two viable public safety radio manufacturers (a field quickly narrowed to one when you read the article), and that you will help to ensure that all of the hard work that has gone in to Project 25 by so many people from many different companies and agencies will not be subverted by Motorola's blatant self-interests. I think an issue that needs to be addressed by the Project 25 Committee... and soon... is a method of determining just when a vendor can state in their advertising that a product or system is "Project 25 compliant". Compliance with such guidelines would need to be voluntary, of course... but those vendors who truly support the Project 25 standards process would certainly be willing to participate. I'm sure that Motorola would strenuously object to such guidelines... it will be at that moment when the Project 25 committee, and APCO, will demonstrate its true strength of character.

Sincerely,

Dan Howard
Orbacom Systems
(Commercial APCO Member #9691084, Texas Chapter)

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